

Message

From: Doherty, Michael [Doherty.Michael@epa.gov]
Sent: 12/14/2020 5:12:02 PM
To: Niman, Aaron [niman.aaron@epa.gov]; Miller, David [Miller.DavidJ@epa.gov]
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

The data would need to be submitted now.

The schedule I have doesn't show any reserved compounds. We'd generally prefer to substitute either a new compound or other periodic review compound for aldicarb, but if none are available, we could give the reviewer a couple of new use compounds (again, assuming some are in reserve and available).

From: Niman, Aaron <niman.aaron@epa.gov>
Sent: Monday, December 14, 2020 12:08 PM
To: Doherty, Michael <Doherty.Michael@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Note that Chlorpyrifos is the RESERVE periodic review compound for 2021. Mike, you might know more about whether JMPR chooses to do a new use evaluation vs. periodic review. Regardless, wouldn't the data need to be submitted now!?

-Aaron

-Aaron

From: Doherty, Michael <Doherty.Michael@epa.gov>
Sent: Monday, December 14, 2020 12:05 PM
To: Miller, David <Miller.DavidJ@epa.gov>; Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Good point! Of course if nothing is submitted, there will be nothing to work on 😊

We (JMPR) would want to determine, ASAP, if we should move something from the reserved category to active and give it to the person slated for aldicarb review.

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Monday, December 14, 2020 12:03 PM
To: Doherty, Michael <Doherty.Michael@epa.gov>; Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

You say below "If not, I think she needs to be so that we *don't waste time working on it* (unless there's going to be a big surprise and EPA is going to release the studies).

It's not clear to me that there is anything for JMPR to work on. If there is, it would be good to know what it is. I don't want to pretend to know that what is available to JMPR now is necessarily insufficient, though I strongly expect it is. But I think what is most important to know is that the Aglogic sponser seems to think it needs data from Bayer to supply to JMPR, but Bayer has indicated that it will not release this data nor permit EPA to release it.

David

From: Doherty, Michael <Doherty.Michael@epa.gov>
Sent: Monday, December 14, 2020 11:59 AM
To: Miller, David <Miller.DavidJ@epa.gov>; Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Okay

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Monday, December 14, 2020 11:51 AM
To: Doherty, Michael <Doherty.Michael@epa.gov>; Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Mike – let me send one to you first.

From: Doherty, Michael <Doherty.Michael@epa.gov>
Sent: Monday, December 14, 2020 11:50 AM
To: Niman, Aaron <niman.aaron@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Okay. I'll send her a note so she's aware that there are issues.

Mike

From: Niman, Aaron <niman.aaron@epa.gov>
Sent: Monday, December 14, 2020 11:37 AM
To: Doherty, Michael <Doherty.Michael@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Thanks Mike!

I think the past correspondence between AgLogic and JMPR has been through Soren Madsen.

-Aaron

From: Doherty, Michael <Doherty.Michael@epa.gov>
Sent: Monday, December 14, 2020 11:33 AM
To: Miller, David <Miller.DavidJ@epa.gov>
Cc: Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Thanks for the background info.

Chlorpyrifos is on the schedule and assigned a reviewer, but there is a note that Corteva will not support periodic review. At this point, I'm interpreting it as a placeholder in case someone else steps in to provide support.

Aldicarb is also on the schedule, and has a reviewer assigned. It is noted as being supported by AgLogic. I can't remember if Mme. Yang has been brought into the loop on the issues with this one. If not, I think she needs to be so that we don't waste time working on it (unless there's going to be a big surprise and EPA is going to release the studies).

Mike

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Monday, December 14, 2020 11:11 AM
To: Doherty, Michael <Doherty.Michael@epa.gov>
Cc: Niman, Aaron <niman.aaron@epa.gov>
Subject: RE: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Mike:

Part of the reason we are asking: Corteva has indicated that they will not provide support for CPY. I suspect the EU might have concerns about CPY. Meanwhile, EPA is and has been at one time or another marching forward, sideways, backwards, and diagonal on this topic. If CPY is up for periodic review at JMPR 2021 and not sponsor steps up (and Corteva has affirmatively said they would NOT sponsor/support this), a perfectly logical thing for JMPR to do is to not "do" it and this comes up to CCPR52 next spring. With no report from JMPR and the registrant affirmatively saying they will not support it, the CPY CXL will presumably be removed from the books. Harmonization between EPA and Codex then goes by the wayside and no CXL exists for something we in the US have registered.

Same goes for aldicarb. As you know, Bayer is not releasing any supporting data. AgLogic wants them to, but they still aren't. In fact AgLogic is/has met with Alex Dunn on the US citrus tolerance for aldicarb. So, this is another one: poof goes the CXL while the US is seeking to possibly expand uses.

David.

From: Niman, Aaron <niman.aaron@epa.gov>
Sent: Monday, December 14, 2020 10:51 AM
To: Doherty, Michael <Doherty.Michael@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>
Subject: JMPR 2021 - Review Status of Chlorpyrifos and Aldicarb

Hi Mike,

David asked me to check-in with you on the status of periodic reviews for chlorpyrifos and aldicarb.

Aldicarb is listed on the JMPR review schedule and chlorpyrifos is listed as RESERVE, but is not supported by the sponsor. Do you know if JMPR has assigned reviews for this compounds and if they will be on the agenda for the 2021 JMPR Regular Meeting?

Thanks,

Aaron Niman
Environmental Health Scientist
LCDR, U.S. Public Health Service

Health Effects Division | Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Tel: 703.347.8184
Niman.Aaron@epa.gov

